

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMY BARTOLETTI, CHIA SIU,
NADINE MENTOR, LISA CONLEY and
BRITTANY SHARPTON,

Plaintiffs,

v.

CITIGROUP INC. and CITIGROUP GLOBAL
MARKETS INC.,

Defendants.

Civil Action No. 10 Civ. 7820 (WHP)

RULE 26(F) DISCOVERY PLAN

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In accordance with Rule 26(f) of the Federal Rules of Civil Procedure and this Court's October 21, 2010 Order For Initial Pretrial Conference, the parties have conferred pursuant to Rule 26(f) and submit the following discovery plan. Except as otherwise stated herein, the parties agree to conduct discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York.

1. RULE 26(A) INITIAL DISCLOSURES

- a. The parties will provide initial disclosures pursuant to Rule 26(a)(1)(A) by April 7, 2011.

2. FACT DISCOVERY

- a. The parties propose that fact discovery will close on December 23, 2011.

3. EXPERT DISCOVERY

- a. If either party intends to rely on an expert witness, such party shall identify such witness(es) by January 27, 2012.

- b. For any expert witness so identified by the parties, disclosures pursuant to Rule 26(a)(2) shall be due by February 27, 2012.
- c. Disclosures pursuant to Rule 26(a)(2) for rebuttal expert witnesses, if any, shall be due by March 30, 2012.
- d. All expert discovery, including depositions, shall be completed by April 27, 2012.


4. ELECTRONIC DISCOVERY

- a. The parties have conferred with respect to discovery of electronically stored information and have agreed that, consistent with Fed. R. Civ. P. 34(b)(2)(E), the parties will produce electronic documents as they are kept in the usual course of business.

Dated: March 25, 2010

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By: _____


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